

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

NORIX GROUP, INC.,)	
)	
Plaintiff,)	
)	
v.)	Case No. 1:20-cv-1158
)	Hon. Gary S. Feinerman
)	
CORRECTIONAL TECHNOLOGIES, INC.,)	
d/b/a CORTECH USA, and VDL)	
INDUSTRIES, LLC, d/b/a AMERICAN)	
SHAMROCK,)	
)	
Defendants.)	
)	

**DEFENDANTS' MOTION FOR LEAVE TO FILE PORTIONS OF THEIR RESPONSE
IN OPPOSITION TO PLAINTIFF'S MOTION TO DISMISS DEFENDANTS'
THIRD AND FOURTH COUNTERCLAIMS AND TO STRIKE DEFENDANTS'
THIRD AND FOURTH AFFIRMATIVE DEFENSES AND CERTAIN
EXHIBITS UNDER SEAL PURSUANT TO LOCAL RULE 26.2**

Defendants, Correctional Technologies, Inc. d/b/a Cortech USA and VDL Industries, LLC d/b/a American Shamrock (hereinafter "Defendants" or "Cortech"), by their attorneys, hereby request the Court enter an order permitting them to file their Response in Opposition to Plaintiff's Motion to Dismiss Defendants' Third and Fourth Counterclaims and to Strike Defendants' Third and Fourth Affirmative Defenses and Certain Exhibits submitted therewith under seal pursuant to Local Rule 26.2.

In Defendants' Response in Opposition to Norix's Motion to Dismiss and Strike Defendants have cited an example letter and corresponding testimony about the letter in support of their argument. The document was designated Confidential by Norix in the earlier filed and

ongoing lawsuit - Case No. 17-CV-07914 (“the 2017 Case”) – and the testimony from the author was designated “Highly Confidential” by Norix in the 2017 Case.

Although Defendants believe that the document and testimony were publicly disclosed during oral argument on a motion for protective order in the 2017 Case, in an abundance of caution and in order to avoid unnecessary motion practice as to whether confidentiality has been waived, Defendants seek to file a small portion of its Response and two of the exhibits under seal.

In that regard, Defendants are merely seeking to honor their agreement with Plaintiff in prior case where Plaintiff’s designation of Confidentiality with respect to the document and cited testimony of its witness that Defendants deemed relevant to their Response in opposition to Plaintiff’s Motion.

WHEREFORE, Defendants respectfully request that the Court grant their Motion for Leave to File Their Motion and Memorandum in Support of said Motion Under Seal pursuant to Local Rule 26.2 and allow Defendants to file a public redacted version of the Motion and a sealed version of said Motion and exhibits with the Court.

Respectfully submitted,

Dated: May 27, 2021

By: /s/ Gerald C. Willis
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Attorneys for Defendants,
Correctional Technologies, Inc., and VDL
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that she caused a true and correct copy of the foregoing **DEFENDANTS' MOTION FOR LEAVE TO FILE PORTIONS OF THEIR RESPONSE IN OPPOSITION TO PLAINTIFF'S MOTION TO DISMISS DEFENDANTS' THIRD AND FOURTH COUNTERCLAIMS AND TO STRIKE DEFENDANTS' THIRD AND FOURTH AFFIRMATIVE DEFENSES AND CERTAIN EXHIBITS UNDER SEAL PURSUANT TO LOCAL RULE 26.2** to be served on this 27th day of May, 2021, upon all counsel of record on this case via the court's electronic filing system.

/s/ Violet Tovar